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File No. 019942-0069

April 26, 2007

**VIA ECF**

Honorable Mark Falk  
 United States Magistrate Judge  
 Martin Luther King, Jr. Federal Bldg & Courthouse  
 50 Walnut Street  
 Newark, New Jersey 07102

**Re: *Ames v. Corporation of the President of the Church of Jesus Christ of Latter-Day Saints, et al., Civil Action No. 06-cv-3441 (WJM)(MF)***

Dear Judge Falk:

Enclosed please find a proposed Consent Order directing the New Jersey Division of Youth and Family Services to release records relating to Plaintiff David V. Ames and for an in camera review of same.

As Your Honor no doubt recalls, this is an action brought by Plaintiff David Ames alleging, among other claims, that the Corporation of the President of the Church of Jesus Christ of Latter-Day Saints (the "Mormon Church") was negligent in not preventing Scott Hanson from sexually abusing Plaintiff during the late 1990's and continuing into 2000. In 2000, the New Jersey Division of Youth and Family Services ("DYFS") conducted an investigation into the allegations that Scott Hanson was sexually abusing David Ames. Both the Mormon Church and Plaintiff seek discovery of DYFS' records of that investigation. DYFS requires a court order before it will provide any such discovery, however. See N.J. Stat. § 9:6-8.10a (2007). DYFS also requires an in camera review by Your Honor before releasing any such information to the parties.

Our office has been informed by Chamise Carter, Esq. of the Office of Legal Affairs for DYFS that it will not object to the form of this order.

Thank you for your consideration in this matter.

Respectfully submitted,

/S/ Alan E. Kraus  
 Alan E. Kraus  
 of LATHAM & WATKINS LLP

Enclosures

cc.: Steven C. Rubino, Esq. (VIA ECF)  
 Chamise Carter, Esq. (VIA Federal Express)

LATHAM & WATKINS<sup>LLP</sup>

Ressie L. Fuller, Esq. (VIA Federal Express)